



State of Louisiana

Louisiana Department of Health
Office of the Public Health

CERTIFIED MAIL: 7007 3020 0002 8525 1279

February 5, 2019

Chad Lavoie
Water Purification Superintendent
Sewerage & Water Board of New Orleans
8800 South Claiborne Ave
New Orleans, LA 70118

Re: **NOTICE OF VIOLATION**
Cross Connection Violation
Community Water System
New Orleans Carrollton Water Works
PWS ID # LA1071009
Orleans Parish

Dear Mr. Lavoie:

On January 31, 2019 the undersigned, Alicia Martinez, District I Engineer, and Parker Allen, Region 1 Engineer Intern met with representatives of the Sewerage and Water Board of New Orleans (SWBNO) and performed a site visit at New Orleans Carrollton Water Plant. Also attending the meeting on behalf of LDH, via phone, but not present during the site visit were:

- Caryn Benjamin, Deputy Chief Compliance
- Jeremy Harris, Engineer Intern II

Present on behalf of SWBNO included:

- Robert (Bob) Turner, General Superintendent
- Bruce Adams, Deputy General Superintendent
- Chad Lavoie, Water Purification Superintendent
- Ron Spooner, Chief of Engineering
- Eric Labat, Chief of Operations

The meeting and subsequent site visit was performed in response to notification by SWBNO of a cross-connection between the Carrollton Water Plant clearwell and the Carrollton Power Plant cooling water system. An assessment report by Jacobs Engineering Group Inc. (Jacobs), dated January 17, 2019, was presented and discussed. The subject report identified six potential projects to mitigate the cooling water cross-connection, completely eliminating the cross-connections within approximately 3 years.

Based on that meeting and site visit, the following item is noted not in conformity with the Louisiana State Sanitary Code:

1. Cooling water from turbines and steam pumps located in the powerhouse (as detailed in the Jacobs report) is being reintroduced into the finished water clearwell.

NOTICE OF VIOLATION

1. LAC 51:XII.343.A - There shall be no physical connection between a public water supply and any other water supply which is not of equal sanitary quality and under an equal degree of official supervision; and there shall be no connection or arrangement by which unsafe water, hazardous fluid or contamination may enter a public water supply system.
2. LAC 51:XII.345.A - There shall be no cross-connection, auxiliary intake, bypass, inter-connection or other arrangement, including overhead leakage, whereby water from a source that does not comply with these regulations may be discharged or drawn into any potable water supply which does comply with these requirements. The use of valves, including check or back pressure valves, is not considered protection against return flow, or back-siphonage, or for the prevention of flow of water from an unapproved source into an approved system.

This is a serious situation that demands immediate action.

1. Within 7 days of receipt of this letter provide a schematic that accurately depicts Carrollton Water Plant's point-of-entries to the distribution system.
2. Within 7 days of receipt of this letter provide a schematic that accurately depicts turbine water cooling and steam pump recirculation lines, identifying sample locations required to satisfy item 3 below.
3. Within 30 days of receipt of this letter, begin monitoring the cross-connection return lines (5 per Jacobs report), as near to the clearwell as practical, as per the following:
 - Monthly for bacteria (TC, E.coli and Legionella) and water temperature and pH; and
 - Quarterly for Metals, Nitrates, Nitrites, and TTHMs for the Steam turbines;
 - Quarterly for Metals, Nitrates, Nitrites, TTHMs and VOCs for the Gas turbine.

Submit the results of monitoring by the 10th of the month of the quarter or month sampled, and immediately for MCL exceedances.

4. Within 90 days of receiving this letter a written response to the violation must be submitted to the department. The response must summarize what actions you have taken to correct these items, and include all required documentation to support those actions. If additional time is required to correct this violation, then the written response must also contain a request with specific actions and dates when the violation will be corrected.

The above noted violations must be corrected to avoid possible enforcement action by the LDH-OPH Enforcement Unit. Interim corrective actions shall be performed as necessary to prevent health hazards and nuisances. As stated above, written confirmation must be provided within 90 days of receipt of this letter of your actions with regard to this matter.

If this office can be of assistance, please do not hesitate to contact me at (504) 599-0112.

Sincerely,



John G. Williams, P.E.
Deputy Chief Field Operations Districts I & II
LDH/OPH, Engineering Services

cc: Alicia Martinez, District I Engineer
Parker Allen E.I., Regional 1 Engineer Intern